CONFIDENTIAL

PRELIMINARY ASSESSMENT EQUIVALENT REPORT
AUTOMOTIVE FINISHES, INC. SITE
6340 WYOMING ROAD
DEARBORN, WAYNE COUNTY, MICHIGAN
TDD: S05-9611-013
PAN: 6B1372SI

November 20, 1997

Prepared for:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Site Assessment Section
77 West Jackson Boulevard
Chicago, Illinois 60604

Prepared by: Steven J. Shore for Date: 11/20/97
Mark A. Ramaly, START Member

Reviewed by: Date: 11/20/97
for Mary Jane Ripp, START Assistant Program Manager

Approved by: Date: 11/20/97
Thomas Kouris, START Program Manager

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1. Introduction

The Ecology and Environment, Inc. (E & E), Superfund Technical Assessment and Response Team (START) has been tasked by the United States Environmental Protection Agency (U.S. EPA) to complete a Preliminary Assessment (PA) Equivalent Report for the Automotive Finishes, Inc. (AFI), site under Technical Direction Document (TDD) S05-9611-013. The PA Equivalent Report is based on information and data from the Site Assessment Report prepared by E & E, and information provided by E & E and U.S. EPA personnel. Additional details on the site assessment, including photographs and validated analytical results, are available in the U.S. EPA Region 5 site file.

2. Site Description

The AFI site is a former automobile painting facility located at 6340 Wyoming Road in Dearborn, Wayne County, Michigan. The site coordinates are 42°20'16.4" North latitude and 83°09'29.5" West longitude (Appendix A). The site is located in an urban industrial area of Dearborn, Michigan, and occupies approximately 5 acres. The site consists of a courtyard, parking area, grassy field, and two buildings (Appendix B).

The site is the location of more than fifteen hundred 55-gallon drums and 1,000 small containers containing flammable materials, which are suspected of containing corrosive and other hazardous materials. The drums and containers are located both inside and outside of the buildings and are in poor condition. In addition, four aboveground storage tanks were located inside one of the buildings (Appendix B).

The nearest residences are located approximately 0.25 miles north and east of the site. The site is surrounded by a barbed wire fence and is frequently monitored by security personnel (Appendix B). The nearest surface water bodies are the Rouge River located 2.1 miles south of the site, and Baby Creek located 2.1 miles southeast of the site (Appendix A). Residents of Dearborn and surrounding areas receive drinking water from intakes in Lake Huron and the Detroit River.

3. Previous Assessment and Removal Activities

A removal site assessment was conducted by START and U.S. EPA in December of 1996. Eight drum samples were collected by START. Analytical results indicated the drums contained flammable materials, and elevated levels of volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and metals. Through reconnaissance and photodocumentation, many drums and containers are suspected to contain corrosive and other hazardous materials (Appendix B).

A removal action at the AFI site will be conducted by Philip Environmental. This removal will address the drums and numerous small containers. At this time, START is not conducting oversight of this removal action.

4. Migration and Exposure Pathway Factors and Targets

This section describes the four migration and exposure pathways and targets associated with the AFI site. Section 4.1 discusses the groundwater migration pathway; Section 4.2 discusses the surface water migration pathway; Section 4.3 discusses the soil exposure pathway; and Section 4.4 discusses the air migration pathway.

4.1 Groundwater Migration Pathway

Contamination of groundwater was not observed during the site assessment. Groundwater is not used as a source of drinking water in the vicinity of the site.

4.2 Surface Water Migration Pathway

Runoff from the site enters the city sewer system. The nearest surface water bodies are the Rouge River, located 2.1 miles south of the site, and Baby Creek located 2.1 miles southeast of the site (Appendix A). Residents of Dearborn and surrounding areas receive drinking water from Lake Huron and the Detroit River.

4.3 Soil Exposure Pathway

Access to the site is restricted by a barbed wire fence and periodic security visits; however, vandals or trespassers could gain access. The nearest residences are located approximately 0.25 miles north and east of the site (Appendix B).

4.4 Air Migration Pathway

Comprehensive air particulate sampling has not occurred at the AFI site.

5. Summary

More than 1,500 drums and 1,000 small containers of potentially hazardous substances are improperly stored at the AFI site. START and U.S. EPA identified flammable materials, VOCs, SVOCs, and metals at the site (Appendix B).

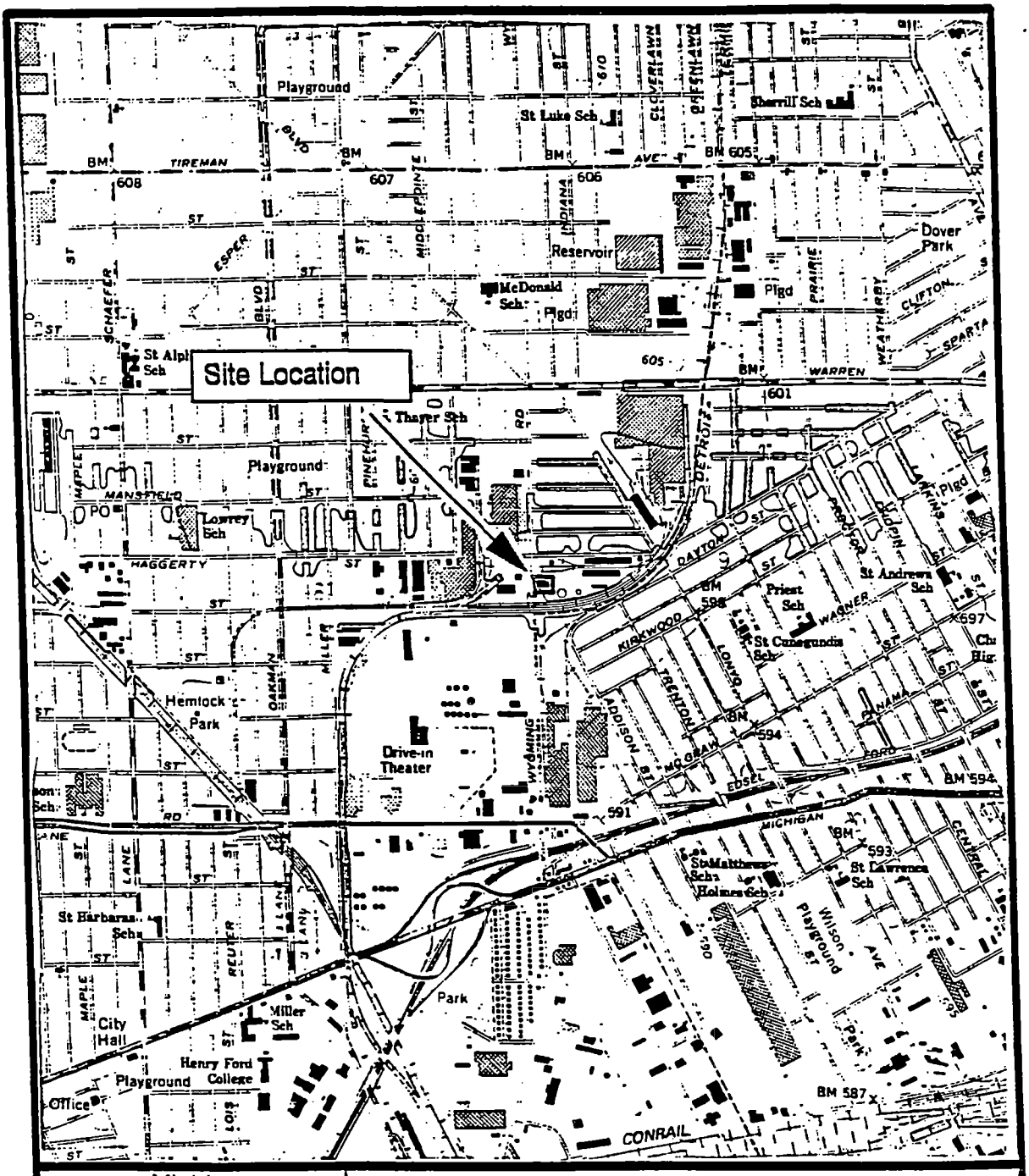
A threat to human and animal populations exists through direct contact with the hazardous substances at AFI. The facility is slightly accessible and residences are located within 0.25 miles of the site. Many of the drums are in poor condition and are deteriorating. Standing water and changing temperatures and weather conditions continue to facilitate drum deterioration (Appendix B).

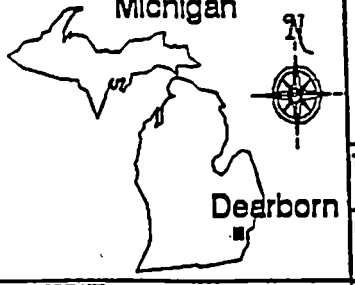
The site poses an imminent and substantial threat to public health and welfare (Appendix B). A removal action will be conducted by Philip Environmental. This removal will address the drums and containers at the AFI site. At this time, START is not conducting oversight of this removal action.

Appendix A

Site Maps

Source: Ecology And Environment, Inc., 1997, *Letter Report for Automotive Finishes, Inc.*, Taylor, Michigan.





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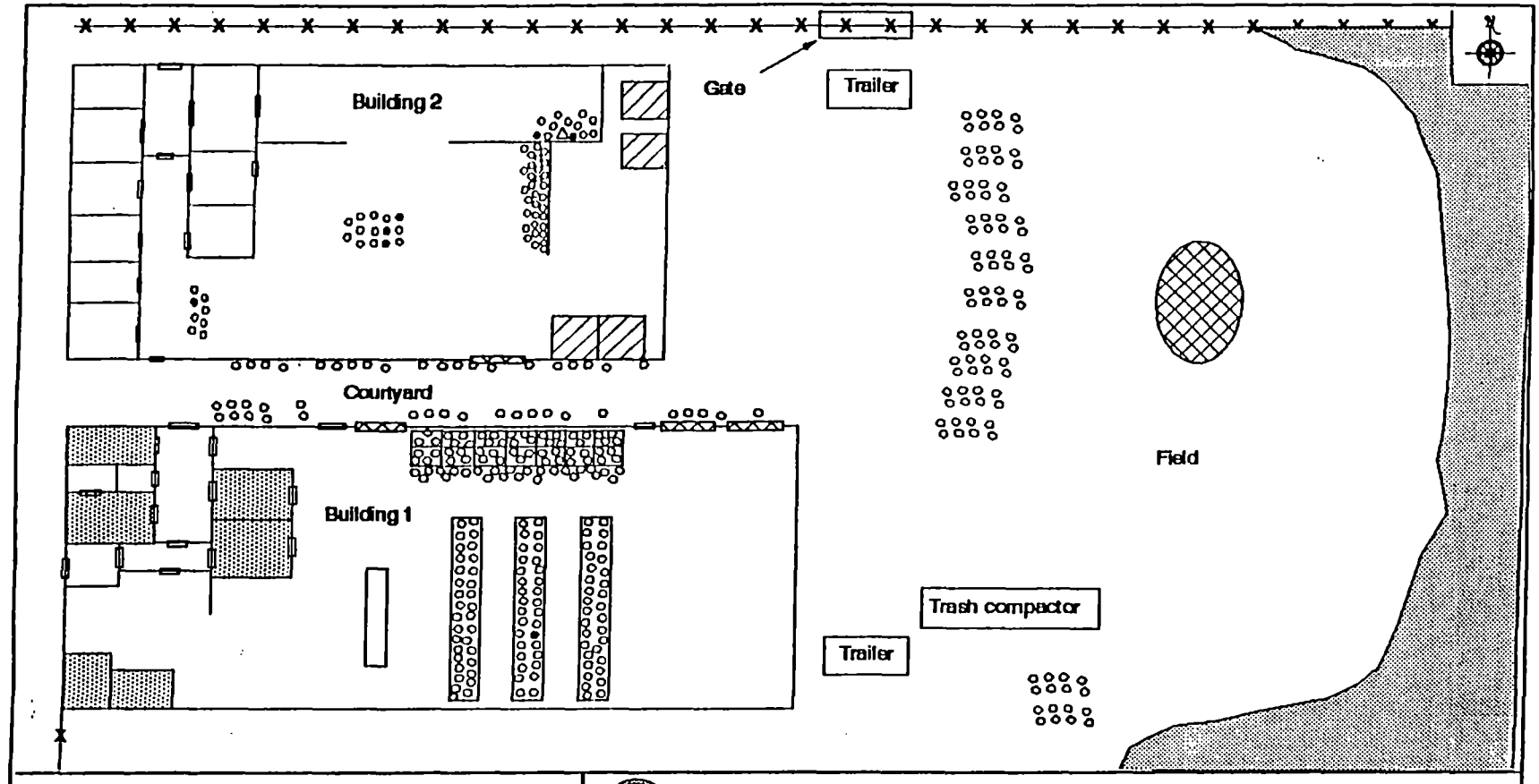
Region V

TITLE: Site Location Map		FIGURE #: 1
SITE: Automotive Finishes, Inc.		SCALE: 1:24,000
SOURCE/DATE: USGS Quadrangle 7.5 Minute Series Dearborn, MI P.R. 1983	CITY: Dearborn STATE: Michigan	TDD #: S05-9612-010



Legend

- Garage door
- Door
- Five-gallon bucket
- Drums
- Aboveground storage tank
- Fence
- Drums on side
- Offices
- Berm and vegetation

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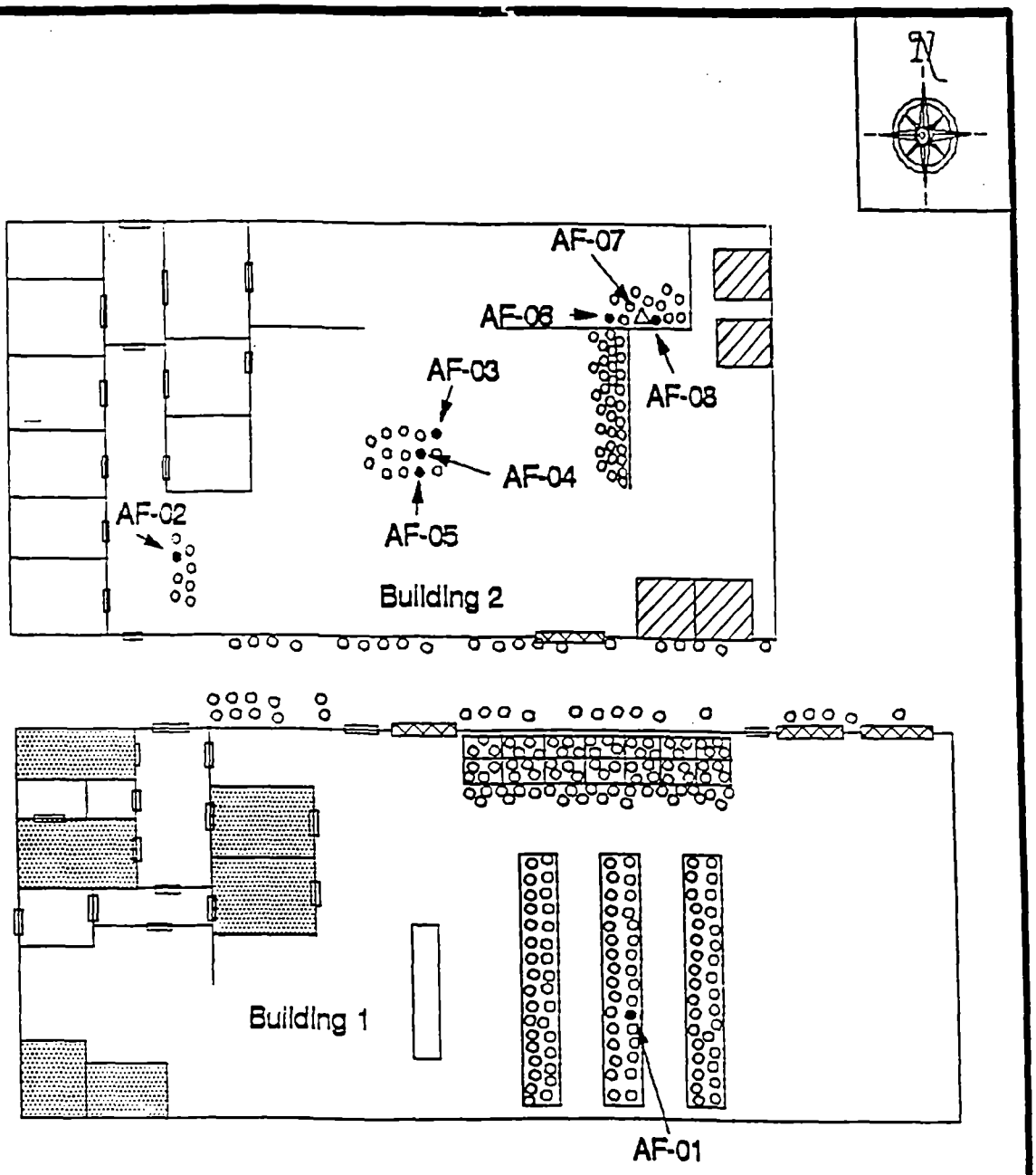
TITLE	Site Features Map	FIGURE #	2
SITE	Automotive Finishes, Inc.	SCALE	Not to scale
CITY	Dearborn	STATE Michigan	TDD # S05-9612-010
SOURCE	Ecology and Environment, Inc.	DATE	February 19, 1997



Legend

△ Five gallon bucket

• Sample drum

○ Drum

▨ Aboveground storage tank

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TITLE: Sample Location Map	FIGURE #: 3
SITE: Automotive Finishes, Inc.	SCALE: Not to scale
CITY: Dearborn STATE: Michigan	TDD #: S05-9612-010
SOURCE: Ecology and Environment, Inc.	DATE: February 19, 1997

Appendix B

START Site Assessment Letter Report

LETTER REPORT
FOR
AUTOMOTIVE FINISHES, INC.
DEARBORN, WAYNE COUNTY, MICHIGAN
TDD S05-9612-010
PAN 6D1001SIXX

March 19, 1997

Prepared for:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Emergency Response Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

Prepared by: Anne Hellie Date: 3/20/97
Anne Hellie, START Project Manager

Reviewed by: Michael Dieckhaus for Karen T. Dieckhaus Date: 3/20/97
Karen T. Dieckhaus, START Member

Approved by: Michael L. Dieckhaus Date: 3/20/97
Michael Dieckhaus, START Assistant Program Manager

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March 19, 1997

Ms. Gail Nabasny
START Project Officer
Emergency Support Section
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Automotive Finishes, Inc.
Dearborn, Wayne County, Michigan
TDD S05-9612-010
PAN 6D1001SIXX

Dear Ms. Nabasny:

On December 20, 1996, the Ecology and Environment, Inc. (E & E), Superfund Technical Assessment and Response Team (START) was tasked by the United States Environmental Protection Agency (U.S. EPA) to conduct a site assessment at the inactive Automotive Finishes, Inc. (AFI), site in Dearborn, Wayne County, Michigan, under Technical Direction Document (TDD) S05-9612-010. Tasks to be completed under the TDD included: collecting, analyzing, and/or validating analytical samples; providing quality assurance/quality control (QA/QC) support; providing for laboratory analysis; providing data to identify the existence and extent of a release, the source and nature of the hazardous substance, and the extent of danger to the public; identifying personal safety requirements and providing health and safety support; evaluating disposal options; conducting extent of contamination surveys; performing surveillance activities using a variety of vehicles, communication and audio-visual equipment; conducting technical reviews of site-related files; providing administrative and technical support to U.S. EPA in the preparation of site reports and other technical site-related documents; and evaluating the threat posed by wastes potentially migrating from the AFI facility based on Title 40 Code of Federal Regulations (CFR) 300.415, National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The site was referred to the U.S. EPA Emergency Response Branch through the Brownfields Initiative. The START members conducting this site assessment were Cedric N. Gibson, Anne Hellie, and Angela Gout. Photodocumentation is presented in Attachment A.

The AFI site, located at 6340 Wyoming Road, Dearborn, Michigan, is an inactive automotive painting facility (Attachment B, Figure 1) (42°20'16.4" North, 83°9'29.5" West). The property is approximately 5 acres in size and consists of two buildings, a courtyard between the two buildings, a parking area, and a large grassy field. The site, located in an urban\industrial area of the City of Dearborn, is bordered to the west by Wyoming Road, to the east by industrial facilities, and to the south by Detroit Terminal Railroad tracks and the Chrysler McGraw Glass Plant (Attachment B, Figure 2). The nearest

residential areas are approximately 0.25 mile east and north of the site.

AFI is currently bankrupt, and the site was referred to U.S. EPA by the City of Dearborn, through the Brownfields Initiative. According to security personnel, environmental monitoring of the site had recently been conducted, and underground storage tanks (USTs) were believed to be located on the north side of the property. Records concerning the environmental history of the site are currently in the hands of the AFI trustee. Security personnel also notified the U.S. EPA On-Scene Coordinator (OSC) Partap C. Lall that buildings on site were closed in May 1996, and site security has been maintained since August 1996.

On December 26, 1997, OSC Lall and START members Gibson, Hellie, and Gout conducted an assessment at the AFI site. During site reconnaissance activities, the OSC and START observed that large areas of the floor in Buildings 1 and 2 were flooded with water because of a rupture in the sprinkler system piping. Building 1, located on the southwest portion of the property, contained approximately five hundred 55-gallon drums stacked on shelving units, approximately fifty 1-gallon containers, and twenty 5-gallon buckets. Many of the containers were labeled with health, flammability, and reactivity labels, and some drums were labeled with specific content identification, such as solvent sludge and toluene. Some drums were missing bungs, and one drum had either spilled or leaked. Paint pigment powder was present on shelving and the floor of the east side of Building 1.

A courtyard, located between the two buildings, contained unsheltered stacked drums. Many of these drums were empty, although bulging drums were also present. Many of the drums located on the exterior of the site buildings contained labels designating drum contents as solvent sludge, hazardous waste, and flammable liquids, as well as specific content information.

Building 2, located on the northwest side of the property, contained approximately 100 drums, four 1,000-gallon aboveground storage tanks (ASTs) labeled flammable, and one 5-gallon bucket. Some drums in Building 2 were labeled flammable liquid, government formula, poison, and paint sludge, as well as specific content information.

A field was located east of the two buildings. A trailer containing filtration devices was located in this field and east of Building 2. Approximately 150 drums were stacked east of the trailer. Numerous empty drums, containing residues, were on their sides and located east of the stacked drums. A berm and vegetation were present on the east side of the site. A trash compactor was located south of the stacked drums, and approximately 20 drums were located south of the trash compactor. Another trailer was located on the southern side of the field and east of Building 1.

After completing the site reconnaissance, START collected eight drum samples (Attachment B, Figure 3). Sample AF-01, a clear, viscous liquid, was collected from a drum in the eastern portion of Building 1. Sample AF-02 was a thin, clear liquid collected from a drum located on the southwest corner of Building 2. Samples AF-03, AF-04, and AF-05 were collected from drums situated in the center of Building 2. Sample AF-03 was a gray sludge, and

samples AF-04 and AF-05 were thin, clear liquids. Samples AF-06 and AF-08 were collected from drums in the northeast section of Building 2. Sample AF-06 was a thin, orange liquid, and sample AF-08 was a thin, reddish-brown liquid. Sample AF-07, a thin, clear liquid, was collected from one 5-gallon bucket stacked on a drum in the northeast section of Building 2. START, air monitoring drum headspace with a flame ionization detector (FID), determined that organic vapors in the drums were elevated. Air monitoring of drum headspace for organic vapors detected 2,000 metered units in Drum AF-05, 3,725 units in Drum AF-07, and 3,100 units in Drum AF-08.

The eight drum samples were sent to Brighton Analytical, Inc., Brighton, Michigan for analyses. Analytical results from samples collected from AFI indicated low flash points and elevated concentrations of metals, volatile organic compounds (VOCs), and semivolatile organic compounds (SVOCs). Flash point analyses revealed that all samples, excluding sample AF-01, had flash points less than or equal to 100 degrees Fahrenheit (°F). Sample AF-03 contained 1,400 milligrams per liter (mg/L) of total zinc, and sample AF-06 contained 290,000 milligrams per kilogram (mg/kg) of total lead. Sample AF-04 contained 370,000 mg/kg of toluene, and sample AF-08 contained 44,000 mg/kg of total xylenes and 12,000 mg/kg of ethylbenzene (Attachment C).

The presence of hazardous wastes discovered at the AFI site constitute an imminent and substantial threat to public health, or welfare, or the environment based upon factors set forth in the NCP, 40 CFR Section 300.415(b)(2). The site was surrounded by a barbed-wire fence, and according to security personnel, they frequently visit the site. However, the site contained over 1,500 drums, four ASTs, and over 1,000 small buckets and containers. The condition of drums and containers, especially those located on the exterior of the buildings, are deteriorating. Based on these deteriorating conditions, the drums may release their contents. Even though some of the drums are located in buildings, drum contents may freeze, and the drums may bulge and release their contents. The broken water sprinkler exposed drums and containers inside Building 2 to standing water, which has further deteriorated the drums.

Many drums and ASTs from the site were labeled "flammable", which suggests the presence of flammable substances. Low flash points indicate the presence of ignitable materials. Drums labeled "corrosive" suggest additional contact hazards. The contents of open-top containers create dermal and inhalation hazards. Contents of buckets and open containers may be spilled, allowing migration of contaminants off site. Based on the results of the laboratory analyses, the AFI site contains various metals and human carcinogens, which pose additional hazards to nearby human and animal populations.

Based on the results of laboratory analyses and the site investigation, conditions at the site constitute an imminent and substantial threat to public health and welfare. Access to the site is limited, but trespassers may access the site and contact hazardous materials. Contaminated materials may migrate off site and contaminate surrounding areas.

Preparation of this letter report, with the included attachments, completes the tasks specified by this TDD. If you have any questions or need additional information, please contact our office.

Sincerely,

Anne E. Hellie

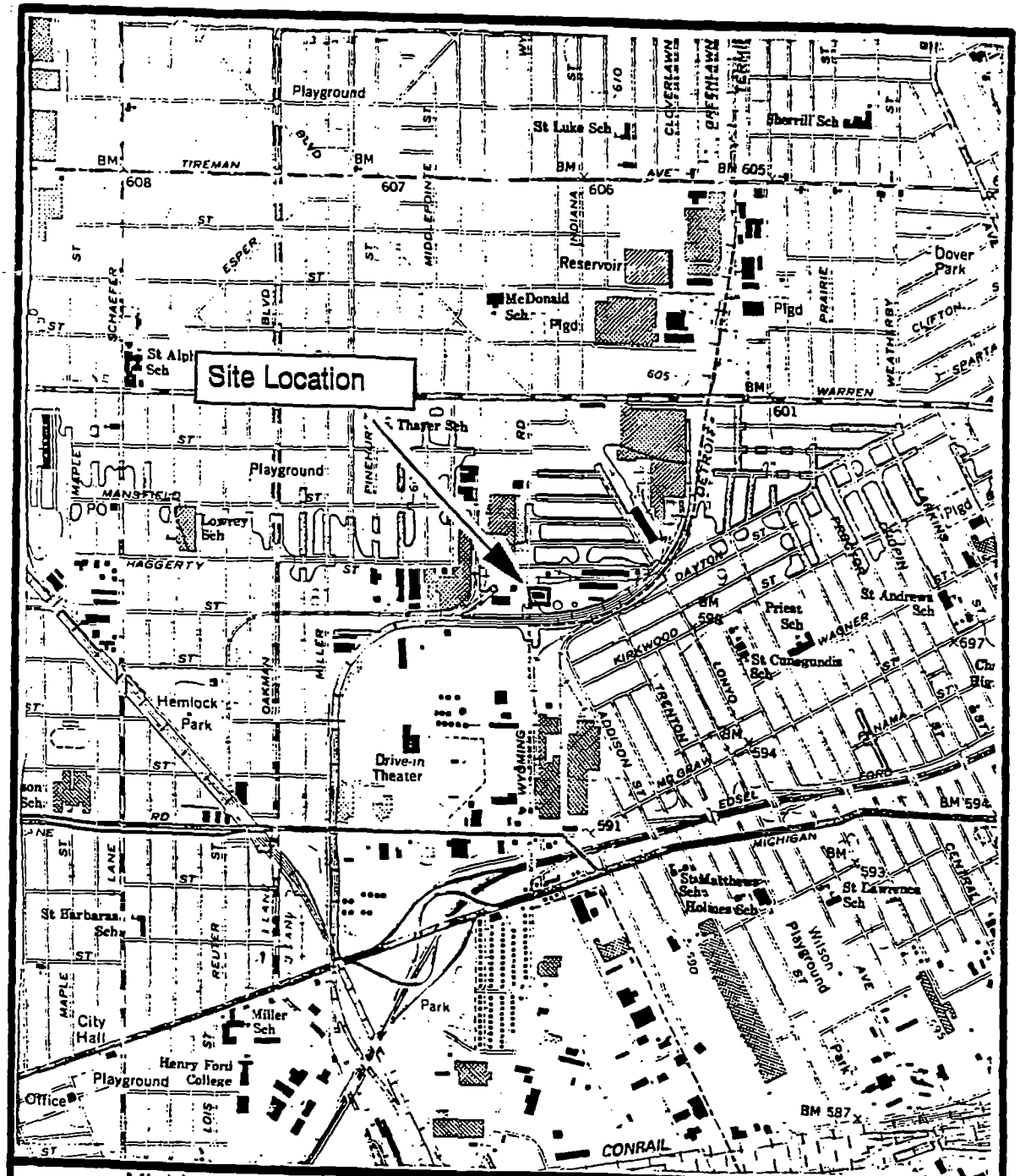
Anne E. Hellie
START Project Manager

Michael L Dieckhaus

Michael L. Dieckhaus
START Assistant Program Manager

Attachment: A - Photodocumentation
B - Illustrations
C - Data Validation Memoranda

cc: Partap C. Lall, OSC, U.S. EPA
TDD Site File



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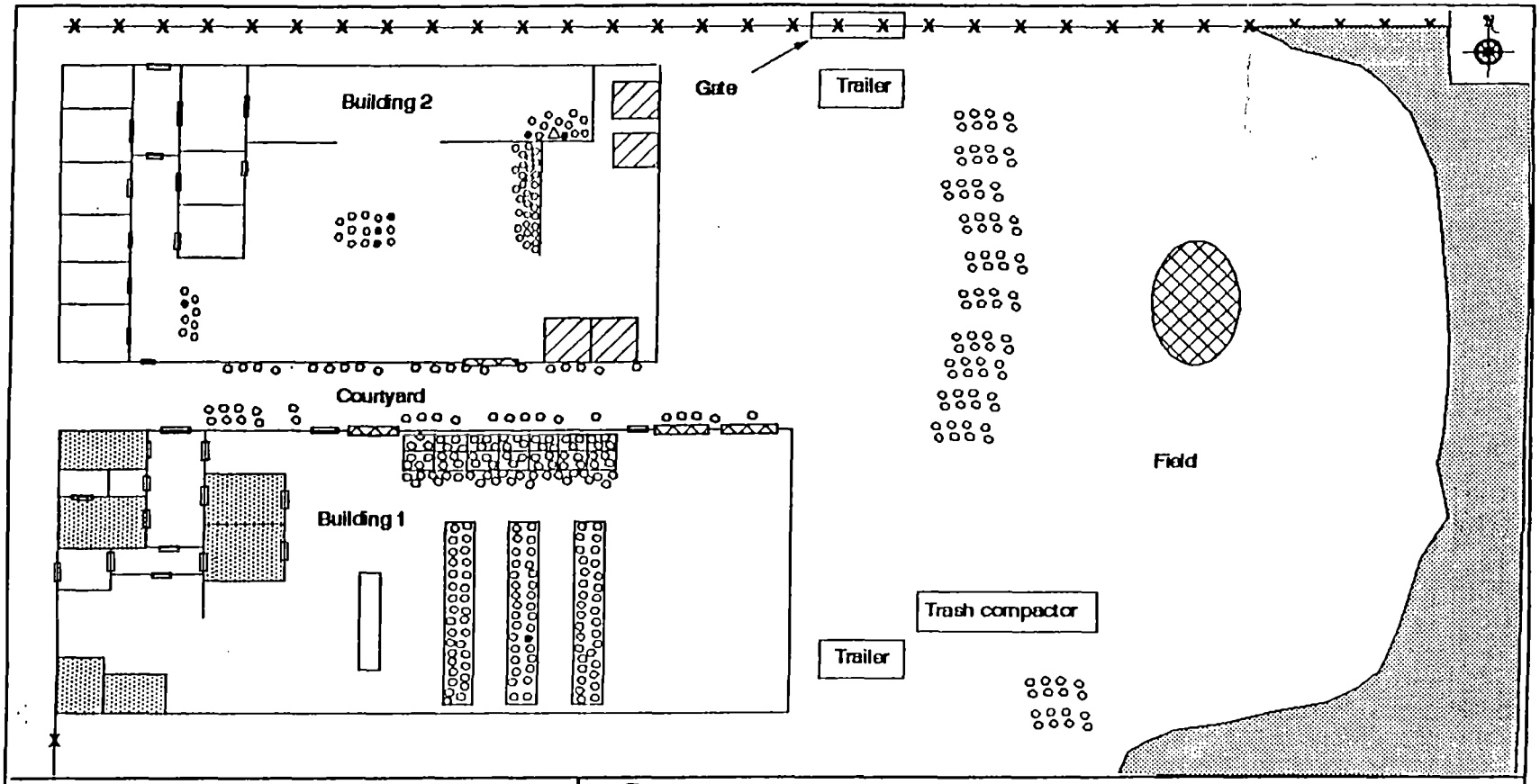

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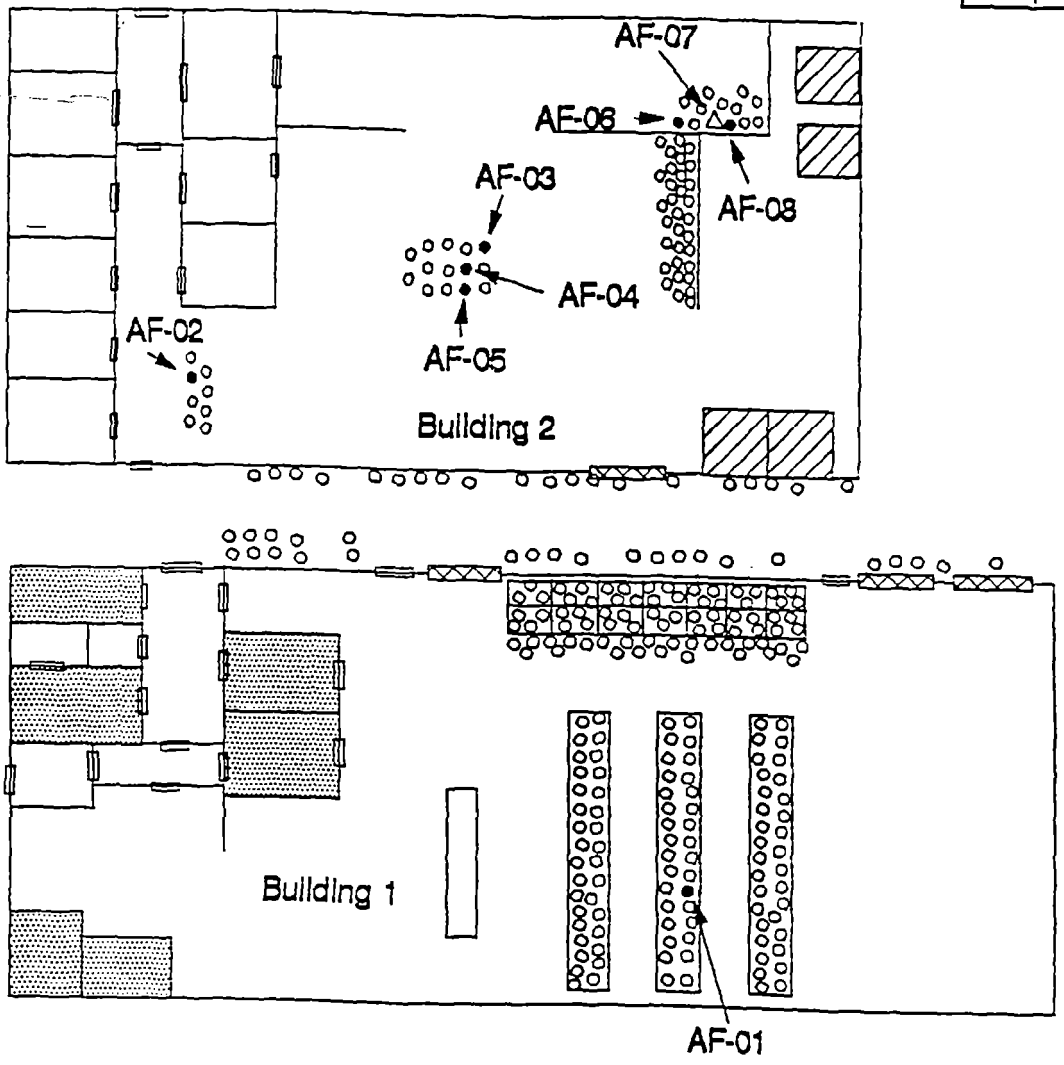

Legend

- △ Five gallon bucket
- • Sample drum
- ○ Drum
- ▨ Aboveground storage tank

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Appendix C

Communication Log, Anne Hellie

ecology and environment, inc., ~~telephone~~ Conversation log

Contact	Company or Agency	
Anne Hellie	E+E	
Position	**Contact Phone Number**	
START Project Manager	N/A	
E & E Employee	**Date**	**Time**
Mark Ramaly	5/8/97	1615
Site Name and Location		**Job No./Pan**
Automotive Finishes, Inc. Dearborn, MI		KJ5102/ 6B1372SIXX

Anne Hellie informed Ramaly that AFI has gone bankrupt and through bankruptcy court, Philip Environmental was awarded funds to remove the drums, ect.. at AFI. Philip has already visited the site and completed some drum sampling. They have not yet begun removing drums from the site.

Signature/Date

Mark A. Ramaly 5/9/97